

REMARKS

Claims 1-3, 5-8, 10-12 and 14-23 are in this application and are presented for consideration. By this amendment, Applicant has amended claims 1, 10, 19 and 23.

Claims 1-3, 5, 6, 8, 10-12, 14 and 16-23 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Zimmer (US 6,109,682) in view of Heuel (US 6,464,286).

Applicant has amended the independent claims to clarify that the internal sheet is moved relative to the external sheet to minimize the gap defined between edge areas of the internal sheet and the bent portion of the external sheet. The sheets are arranged on top of one another such that the two sheets are in sliding contact with one another before welding. This advantageously allows the exact setting of the joint gap between the two sheets regardless of manufacturing tolerances. The prior art as a whole fails to teach or suggest relative movement of an internal sheet with respect to an external sheet as featured in the present invention.

Zimmer does not provide any teaching or suggestion that would direct a person of ordinary skill in the art toward an internal sheet that is movable relative to an external sheet to minimize a gap that is defined between the two sheets as claimed. Zimmer takes a very different approach than that of the present invention. Instead of moving one sheet relative to another sheet as featured in the present invention, Zimmer discloses a motor vehicle door with an internal sheet and an external sheet, wherein the external sheet and the internal sheet are clamped and the edge strips of the internal sheet and of the external sheet are bent. According to Zimmer, the edge strips of the sheets laid one above the other are welded together by a laser beam directed into the gap between the two edge strips. The technique in Zimmer requires a

sophisticated box-like stacking and positioning of the components to each other. This does not provide any teaching or suggestion for moving an internal sheet relative to an external sheet to minimize a gap between the sheets. Compared with Zimmer, the internal sheet moves relative to the external sheet to accurately position the internal sheet prior to the sheets being welded. Zimmer merely discloses that the sheets are laid on each other and are restrained in a supporting range or area between a support and a hold-down device, but Zimmer fails to provide any teaching or suggestion for moving one sheet relative to another to minimize a gap between the sheets as claimed. As such, the rejection does not establish a prima facie case of obviousness as the prior art does not teach or suggest important features of the claimed combination.

Heuel does not provide any teaching or suggestion for an internal sheet that is moved relative to an external sheet as claimed. Heuel only discloses that the outer skin 2 of a door is fastened to an inner skin panel 5 by using punch rivets 11 or other metal fastening elements. However, Heuel is completely void of any teaching or suggestion for moving the inner skin panel 5 relative to the outer skin of the door as featured in the present invention. Heuel only directs a person of ordinary skill in the art toward fastening the end leg 9 of the skin panel 5 to the end leg 9 of the outer skin 2. Heuel does not disclose moving the inner skin panel 5 relative to the outer skin 2 or any particular advantages associated with moving the inner skin panel 5 relative to the outer skin 2. In fact, Heuel does not provide any teaching or suggestion for minimizing a gap between two sheets by moving one sheet relative to the other sheet wherein an open end portion of one sheet moves along an open end portion of another sheet

as featured in the present invention. Heuel does not direct a person of ordinary skill in the art toward the advantages associated with moving an internal sheet relative to an external sheet as featured in the present invention. Heuel does not provide any teaching or suggestion for moving one end leg along another end leg as featured in the present invention. Compared with Heuel, a flange end portion of an external sheet engages at least a portion of a flange end portion of an internal sheet. This allows the end portion of the internal sheet to slide along the end portion of the external sheet when the internal sheet is moved relative to the external sheet. This advantageously allows the internal sheet to abut the external sheet without providing any defects in the appearance of the external sheet. In contrast to the present invention, Heuel, only directs a person of ordinary skill in the art toward end legs that are fastened to each other, but Heuel does not provide any teaching or suggestion for the end legs being in contact with one another such that one of the end legs moves relative to the other end leg when the inner skin panel 5 is moved relative to the outer skin 2 of the door as featured in the present invention. Heuel directs a person of ordinary skill in the art away from sliding contact of open end portions of an internal sheet and an external sheet since Heuel discloses that a seal 10 is provided between the end legs of the inner skin panel 5 and the outer skin 2. As such, the rejection does not establish a prima facie case of obviousness as the prior art as a whole does not teach or suggest essential features of the claimed combination. Accordingly, Applicant respectfully requests that the Examiner favorably consider claims 1, 10 and 19 as now presented and all claims that respectively depend thereon.

Claims 7 and 15 have been rejected under 35 U.S.C. 103(a) as being unpatentable over

Zimmer in view of Heuel, in further view of Klaus et al. EP 0200997).

Although Klaus et al. teaches a welded connection of two light-gauge sheets, the references as a whole fail to suggest the combination of features claimed. Specifically, Zimmer, Heuel and Klaus et al. provide no suggestion or teaching for the combination of moving an internal sheet relative to an external sheet to minimize a gap between the sheets prior to the gap being welded. As such, the references together do not teach or suggest the combination of features claimed. One of ordinary skill in the art is presented with various concepts, but these concepts do not provide any direction as to combining the features claimed. All claims define over the prior art as a whole.

Favorable consideration on the merits is requested.

Respectfully submitted
for Applicant,

A handwritten signature in black ink, appearing to read 'J. McGlew', with a stylized flourish at the end.

By: _____
John James McGlew
Registration No. 31,903
McGLEW AND TUTTLE, P.C.

- and -



By: _____
Brian M. Duncan
Registration No. 58,505
McGLEW AND TUTTLE, P.C.

JJM:BMD
71932RCE-1

DATED: January 26, 2011
BOX 9227 SCARBOROUGH STATION
SCARBOROUGH, NEW YORK 10510-9227
(914) 941-5600

SHOULD ANY OTHER FEE BE REQUIRED, THE PATENT AND TRADEMARK OFFICE
IS HEREBY REQUESTED TO CHARGE SUCH FEE TO OUR DEPOSIT ACCOUNT 13-
0410.